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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

Electrograph Sys. v. Hitachi, Ltd., No. 11-cv-01656;
Electrograph Sys., Inc. v. Technicolor SA, No. 13-cv-05724;
Siegel v. Hitachi, Ltd., No. 11-cv-05502;
Siegel v. Technicolor SA, No. 13-cv-05261;
Best Buy Co. v. Hitachi, Ltd., No. 11-cv-05513;
Best Buy Co. v. Technicolor SA, No. 13-cv-05264;
Interbond Corp. of Am. v. Hitachi, Ltd., No. 11-cv-

Master File No. 3:07-cv-05944-SC

MDL No. 1917

**DECLARATION OF MATTHEW D.
KENT IN SUPPORT PLAINTIFFS'
ADMINISTRATIVE MOTION
PURSUANT TO L.R. 7-11 FOR
EXCESS PAGES**

Judge: Hon. Samuel Conti

06275;
Interbond Corp. of Am. v. Technicolor SA., No. 13-cv-05727;
Office Depot, Inc. v. Hitachi Ltd., No. 11-cv-06276;
CompuCom Sys., Inc. v. Hitachi, Ltd., No. 11-cv-06396;
P.C. Richard & Son Long Island Corp. v. Hitachi, Ltd., No. 12-cv-02648;
P.C. Richard & Son Long Island Corp. v. Technicolor SA., No. 13-cv-05725;
Schultze Agency Servs., LLC v. Hitachi, Ltd., No. 12-cv-02649;
Tech Data Corp. v. Hitachi, Ltd., No. 13-cv-00157;
Dell Inc. and Dell Products L.P., v. Hitachi, Ltd., No. 13-cv-02171;
Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, No. 13-cv-05262;
Sears, Roebuck and Co. and Kmart Corp. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514;
Sharp Elecs. Corp. v. Hitachi, Ltd., No. 13-cv-1173 SC;
Sharp Elecs. Corp. v. Koninklijke Philips Elecs., N.V., No. 13-cv-2776 SC;
ViewSonic Corp. v. Chunghwa Picture Tubes, Ltd., No. 14-02510;
All Indirect Purchaser Actions.

I, **MATTHEW D. KENT**, declare as follows:

1. I am a senior associate with the law firm of Alston & Bird LLP, counsel for Plaintiffs Dell Inc. and Dell Products L.P. (collectively, "Dell") in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I submit this declaration in support of Plaintiffs' Administrative Motion Pursuant to L.R. 7-11 For Excess Pages ("Administrative Motion").

1 I have personal knowledge of the facts stated herein, and I could and would competently testify thereto
2 if called as a witness.

3 2. I am a member in good standing of the State Bar of Georgia and am admitted to practice
4 before the U.S. District Court for the Northern District of Georgia. I have also been admitted to this
5 Court *pro hac vice* as counsel for Dell pursuant to the Court's Pretrial Order No. 1 in the MDL
6 Proceeding.

7 3. On November 7, 2014, the Philips Defendants filed two separate motions for summary
8 judgment: (1) Koninklijke Philips N.V. filed a Notice of Motion and Motion for Summary Judgment
9 (MDL Dkt. #3040); and (2) Philips Electronics North America Corporation, Philips Taiwan Limited,
10 and Philips Do Brasil Ltda. filed a separate Notice of Motion and Motion for Partial Summary
11 Judgment (MDL Dkt. #3027) (collectively, the "Philips Motions").

12 4. On December 1, 2014, Debra Bernstein and I conferred on a conference call with
13 counsel for the Philips Defendants regarding Plaintiffs' request to file a single, consolidated opposition
14 response brief limited to thirty-five (35) pages to the Philips Motions. Philips counsel stated that they
15 would consider the issue and respond.

16 5. On December 8, 2014, I emailed Philips' counsel requesting a status update on our
17 request for a stipulation.

18 6. On December 9, 2014, Philips' counsel requested a draft copy of the proposed
19 stipulation.

20 7. On December 10, 2014, I emailed a copy of the draft stipulation for Philips
21 consideration. In response to the draft stipulation, Philips' counsel indicated that their ability to agree
22 to the stipulation was dependent on Plaintiffs' ability to respond to the two motions separately.

23 8. On December 15, 2014, I had a final meet and confer call with Philips' counsel
24 concerning the proposed stipulation and counsel for Philips made clear they would not agree to the
25 stipulation and we determined we were at an impasse.
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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on December 15, 2014, in Atlanta, Georgia.

4
5 By: /s/ Matthew D. Kent
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